

1 Laura Vartain Horn (SBN 258485)

**KIRKLAND & ELLIS LLP**

2 555 California Street, Suite 2700

San Francisco, CA 94104

3 Telephone: (415) 439-1625

4 laura.vartain@kirkland.com

5 Allison M. Brown (Admitted *Pro Hac Vice*)

**KIRKLAND & ELLIS LLP**

6 2005 Market Street, Suite 1000

Philadelphia, PA 19103

7 Telephone: (215) 268-5000

8 alli.brown@kirkland.com

9 Jessica Davidson (Admitted *Pro Hac Vice*)

**KIRKLAND & ELLIS LLP**

10 601 Lexington Avenue

New York, NY 10022

11 Telephone: (212) 446-4800

12 jessica.davidson@kirkland.com

13 Kim Bueno (Admitted *Pro Hac Vice*)

**KIRKLAND & ELLIS LLP**

14 401 W. 4th Street

Austin, TX 78701

15 kim.bueno@kirkland.com

16 *Attorneys for Defendants*

17 UBER TECHNOLOGIES, INC.,

18 RASIER, LLC, and RASIER-CA, LLC

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA**

21 **SAN FRANCISCO DIVISION**

22 IN RE: UBER TECHNOLOGIES, INC.,  
23 PASSENGER SEXUAL ASSAULT  
24 LITIGATION

Case No. 3:23-MD-03084-CRB

**DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, AND RASIER-CA,  
LLC'S PROPOSED VOIR DIRE**

25 This Document Relates to:

26 *Jaylynn Dean v. Uber Techs., Inc.,*  
27 No. 23-cv-06708

Judge: Hon. Charles R. Breyer

Courtroom: 6 – 17th Floor

1 Defendants respectfully submit the following proposed voir dire questions:

2 1. Do you rely on social media as a primary source for news?

3 2. Do you believe that if someone claims they have been sexually assaulted, we should  
4 believe that person 100% of the time and not question their claims?

5 3. Do you believe that far too often perpetrators of sexual assault are not punished for  
6 their actions?

7 4. Do you believe that victim blaming, instead of holding perpetrators accountable, is a  
8 major issue in our society?

9 5. Does anyone have a very positive opinion of protests or demonstrations advocating  
10 for sexual assault victims?

11 6. Does anyone believe that victims of sexual assault sometimes exaggerate symptoms  
12 following the incident?

13 7. Do you believe that a person who claims they were sexually assaulted never deserves  
14 any of the blame?

15 8. Some people say that women who choose to get drunk have some responsibility for  
16 negative consequences that occur. Does anyone strongly disagree with that?

17 9. If you hear multiple people accuse the same company for similar wrongdoing, would  
18 you be much more likely to believe the individuals over the company?

19 10. Do you think it is unfair for the law to place the burden of proof on an injured person  
20 to prove that a defendant corporation caused his or her injury?

21 11. When an individual sues a company, do you believe that the company should have the  
22 burden of proving it did not do anything wrong?

23 12. Some folks believe that people who file lawsuits are often looking to capitalize on  
24 sympathy to get money that they do not deserve. Who strongly disagrees with that?

25 13. Some believe that people who are foreign-born are less likely to follow US laws than  
26 U.S.-born individuals. Does anyone strongly disagree with that?

27 14. Do you believe that foreign-born individuals are treated worse than U.S.-born  
28

1 individuals during criminal investigations?

2 15. Who strongly believes rideshare companies should do more thorough screenings of  
3 drivers to protect riders?

4 16. Does anyone believe that a rideshare technology company should always be  
5 responsible for any actions of the drivers and riders who meet through the app?

6 17. When a company is accused of negligence, does anyone believe it is more important  
7 to learn whether the company's actions were ethical rather than whether the company followed the  
8 law?

9 18. Do you strongly believe that most companies care more about profits than keeping  
10 consumers safe?

11 19. Have you been diagnosed or treated for anxiety, PTSD, panic attacks, sleeplessness,  
12 or depression?

13 20. In the last five years, have you taken off from work due to stress or fatigue?

14 21. Do you believe the number of lawsuits against businesses is too low, or that the  
15 damages awarded in lawsuits are too low?

16 22. Some people believe there are too many lawsuits these days. Does anyone disagree  
17 with that?

18 23. Some people say that money awards for pain and suffering should be capped at a  
19 certain amount. Does anyone strongly disagree with that?

20 24. When deciding how much money, if any, to award in a lawsuit, does anyone think it's  
21 more important to consider how much the plaintiff needs the money rather than how much they  
22 deserve it?

1 DATED: December 19, 2025

Respectfully submitted,

2 */s/ Laura Vartain Horn*

3 Laura Vartain Horn (SBN 258485)  
4 **KIRKLAND & ELLIS LLP**  
5 555 California Street, Suite 2700  
6 San Francisco, CA 94104  
7 Telephone: (415) 439-1625  
8 laura.vartain@kirkland.com

9 Allison M. Brown (Admitted *Pro Hac Vice*)  
10 **KIRKLAND & ELLIS LLP**  
11 2005 Market Street, Suite 1000  
12 Philadelphia, PA 19103  
13 Telephone: (215) 268-5000  
14 alli.brown@kirkland.com

15 Jessica Davidson (Admitted *Pro Hac Vice*)  
16 **KIRKLAND & ELLIS LLP**  
17 601 Lexington Avenue  
18 New York, NY 10022  
19 Telephone: (212) 446-4800  
20 jessica.davidson@kirkland.com

21 Kim Bueno (Admitted *Pro Hac Vice*)  
22 **KIRKLAND & ELLIS LLP**  
23 401 W. 4th Street  
24 Austin, TX 78701  
25 kim.bueno@kirkland.com

26 *Attorneys for Defendants*  
27 UBER TECHNOLOGIES, INC.,  
28 RASIER, LLC, and RASIER-CA, LLC

**PROOF OF SERVICE**

I hereby certify that on December 19, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Laura Vartain Horn  
Laura Vartain Horn